

Seth M. Sproul, SBN 217711, sproul@fr.com  
Francis J. Albert, SBN 247741, albert@fr.com  
Fish & Richardson P.C.  
12390 El Camino Real  
San Diego, CA 92130  
Phone: 858-678-5070 / Fax: 858-678-5099

Ruffin B. Cordell, *pro hac vice*, cordell@fr.com  
Lauren A. Degnan, *pro hac vice*, degnan@fr.com  
Fish & Richardson P.C.  
1425 K Street, N.W., 11th floor  
Washington, DC 2005-3500  
Phone: 202-783-5070 / Fax: 202-783-2331

Thad C. Kodish, *pro hac vice*, tkodish@fr.com  
Aamir A. Kazi, *pro hac vice*, kazi@fr.com  
Fish & Richardson P.C.  
1180 Peachtree Street, N.E., Suite 2100  
Atlanta, GA 30309  
Phone: 404-892-5005 / Fax: 404-892-5002

Garland T. Stephens, garland.stephens@weil.com  
Weil, Gotshal & Manges LLP  
700 Louisiana, Suite 1600  
Houston, TX 77002  
Phone: 713-546-5000 / Fax: 713-224-9511

Attorneys for Intervenor Intel Corporation

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

U.S. Ethernet Innovations, LLC,  
Plaintiff,

v.

Acer, Inc., et al.,  
Defendants,

Atheros Communications, Inc., et al.,  
Intervenors.

Case No. 4:10-cv-03724 CW (LB)

INTERVENOR INTEL CORPORATION'S  
L.R. 7-11 ADMINISTRATIVE MOTION  
TO FILE CERTAIN DOCUMENTS  
UNDER SEAL

Date: February 20, 2013  
Time: 2:00 p.m.  
Judge: Hon. Claudia Wilken  
Courtroom: 2, 4<sup>th</sup> floor

Pursuant to Civil Local Rules 7-11 and 79-5, and this Court's General Order No. 62, Intervenor Intel Corporation ("Intel") hereby submits this Motion for Administrative Relief for permission to file supporting documents and declarations under seal.

Intel makes this motion mindful of the Court's direction in its May 17 Order that documents should not be filed under seal absent compelling reasons.

Intel requests permission to file each of the following documents under seal, for the reasons specified below:

- Pursuant to L.R. 79-5(d), Intel seeks leave to file Exhibit 2 of the Declaration of Garland Stephens in Support of Amended Motion to Enjoin Plaintiff from Pursuing Duplicative Claims in the Eastern District of Texas under seal. Exhibit 2 is a true and correct copy of selected excerpts of the transcript of the deposition of Plaintiff USEI taken on April 16, 2013, and has been designated by USEI as "HIGHLY CONFIDENTIAL – PURSUANT TO PROTECTIVE ORDER."

- The remaining exhibits to the Stephens Declaration are not confidential.
- Pursuant to L.R. 79-5(d), Intel also seeks leave to file limited portions of the Amended Motion to Enjoin Plaintiff from Pursuing Duplicative Claims in the Eastern District of Texas under seal. The portions in question discuss and quote Exhibit 2 of the Declaration of Garland Stephens in Support of Amended Motion to Enjoin Plaintiff from Pursuing Duplicative Claims in the Eastern District Of Texas, discussed above, that has been designated by USEI as "HIGHLY CONFIDENTIAL – PURSUANT TO PROTECTIVE ORDER."

Where designated as confidential and filed under seal, the exhibits and information contained within the declarations have been marked as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" pursuant to the Protective Order entered in this case.

For the foregoing reasons, Intel respectfully requests that the Court grant this narrowly tailored request to file the above documents under seal.

1 Dated: January 10, 2014

WEIL, GOTSHAL & MANGES LLP

2 By: s/ Garland T. Stephens

3 Garland T. Stephens, garland.stephens@weil.com

4 Counsel for Intervenor INTEL CORPORATION